

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: TALEN ENERGY SUPPLY, LLC, et al., Debtors.¹	§ § § § § § § § §	Chapter 11 Case No. 22-90054 (MI) (Jointly Administered)
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**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

PLEASE TAKE NOTICE that the undersigned counsel enters their appearances as counsel for Ellingson Drainage, Inc. d/b/a Ellingson DTD (“Ellingson”) and requests that all notices and other papers filed or served in the above-captioned cases be served upon the following attorneys:

Paul L. Ratelle
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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic filing, facsimile, or otherwise filed or made with regard to the referenced cases and proceedings herein.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.ra.kroll.com/talenenergy>. The Debtors’ primary mailing address is 1780 Hughes Landing Boulevard, Suite 800, The Woodlands, Texas 77380.

PLEASE TAKE FURTHER NOTICE that the filing of this Notice of Appearance shall not be deemed or construed to constitute a waiver of any substantive or procedural rights of Ellingson including, without limitation: (i) the right to have final orders in non-core matters entered only after de novo review by the United States District Court for the Southern District of Texas (the “District Court”), (ii) the right to trial by jury in any proceeding related to these cases or any cases, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution, heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Ellingson is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: June 24, 2022

Respectfully submitted,

/s/ Paul L. Ratelle
Paul L. Ratelle (MN#127632)
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*Counsel for Ellingson Drainage, Inc
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Certificate of Service

I hereby certify that on June 24, 2022, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Paul L. Ratelle

Paul L. Ratelle